

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.B.,

Plaintiff,

v.

RED ROOF INNS, INC. et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:22-cv-1181-JPB

**PLAINTIFF'S MOTION FOR PERMISSION TO BRING ELECTRONIC  
EQUIPMENT INTO THE COURTROOM**

Plaintiff, by and through the undersigned counsel, moves the court for an order allowing counsel and staff for counsel to bring electronic equipment into the courtroom for the Pretrial Conference in the above-captioned matter, and states as follows:

(a) The Pretrial Conference in this matter is scheduled to begin at 10:00 a.m. on November 4, 2024;

(b) Counsel intends to utilize the available electronic capabilities that are in the courtroom during the scheduled Pretrial Conference:

| Name  | Electronic Equipment                                      |
|---|---|
| Patrick J. McDonough<br>Andersen, Tate & Carr, P.C.<br>Attorney | Laptop, power cord, cellular<br>phone/smartphone, charger |
| Jonathan S. Tonge<br>Andersen, Tate & Carr, P.C.                | Laptop, power cord, cellular<br>phone/smartphone, charger |

| Name   | Electronic Equipment                                      |
|--|---|
| Attorney   |   |
| Rory A. Weeks<br>Andersen, Tate & Carr, P.C.<br>Attorney       | Laptop, power cord, cellular<br>phone/smartphone, charger |
| Jennifer M. Webster<br>Andersen, Tate & Carr, P.C.<br>Attorney | Laptop, power cord, cellular<br>phone/smartphone, charger |

(c ) Counsel believes that the utilization of this technology will permit for more efficient and expedited proceedings and will aid in the presentation of the case.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting this Motion and permit the above-referenced persons to bring the electronic equipment set forth above into the courtroom and further request that said order be provided to the U.S. Marshals so that counsel, staff of counsel, parties and party representatives may enter the courthouse and courtroom with the above-listed equipment without delays.

Respectfully submitted this 30<sup>th</sup> day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

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## CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

Respectfully submitted this 30<sup>th</sup> day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send an email notification of such filing to the attorneys of record.

Respectfully submitted this 30<sup>th</sup> day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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